

Memorandum

To : Advice Request Meeting Participants

Date : Sept. 4, 1984

at 311A

From : **FAIR POLITICAL PRACTICES COMMISSION**
Carla Wardlow

Subject: Section 86205(a)--Loan to Legislator

A lobbyist is selling his residence in Sacramento and a legislator wants to purchase it. May the lobbyist take back a note on the sale? Section 86205(a) prohibits a lobbyist from doing anything with the purpose of placing any elected state officer, etc., under personal obligation to him or to his employer.

In the Reinhardt opinion (3 FPPC Ops. 83, No. 76-091), the Commission said that an arrangement between a lobbying firm and a state candidate to provide management or consultant services in exchange for full and adequate consideration "is not the type of arrangement at which the Section is directed. The arrangement does not involve an attempt by the firm or its employees to pervert the normal legislative or administrative processes by means of some illegitimate activity...."

Memorandum

To : Advice File: Sections 82036, 84206

Date : November 7, 1984

No. M-84-312

From : **FAIR POLITICAL PRACTICES COMMISSION**

Carla Wardlow

Subject: Loan Forgiveness During Late Contribution Period

Senator Garamendi received a loan during 1982 which was forgiven during the 1984 general election late contribution period. Must the forgiveness be reported as a "late contribution?"

Per Barbara, the forgiveness would not trigger a late contribution report. However, this advice might be different if a payment due during the late contribution period were forgiven.

Memorandum

To : Advice File: Section 82028
82045
18623
18728

Date : Nov. 7, 1984
No. M-84-313

From : **FAIR POLITICAL PRACTICES COMMISSION**
Carla Wardlow

Subject: Reporting Air Transportation Received in Connection
with Speaking Engagements

An official who receives free intrastate transportation in connection with an event at which he or she speaks, participates in a panel, etc., has not received a gift so long as the transportation is provided by or arranged by the sponsor of the event. If the official is required to provide his or her own transportation and arranges for a free ride from some other source, a gift has been received.